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September 15, 2022

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J. United States District Court Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Re: Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC Civil Action No. 22-cv-2632 (JMV) (CLW)

Your Honor:

As Your Honor is aware, this law firm represents defendant SaveOnSP, LLC ("SaveOn") in association with the firm of Selendy Gay Elsberg PLLC in the above-referenced matter. We write to renew our request for oral argument on SaveOn's motion to partially stay discovery ("Motion to Stay") [ECF No. 45], which has been fully briefed and submitted. SaveOn does not have the privilege of a reply, but it would like to have the opportunity to address certain points raised by plaintiff Johnson & Johnson Health Care Systems Inc. ("JJHCS") in its opposition to the Motion to Stay, and we believe oral argument will be useful to the Court in deciding the motion. We would further respectfully suggest that the Court might find the attendance of counsel helpful if any of the dates in SaveOn's proposed scheduling order need to be adjusted.

We thank Your Honor for your kind consideration of this request. Please do not hesitate to have the Court's staff contact me with any questions or if we may be of any assistance to the Court whatsoever.

Respectfully submitted,

s/ E. Evans Wohlforth, Jr.

E. Evans Wohlforth, Jr.

cc: All counsel (via ECF)